

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

CYNTHIA L. MERLINI,)
Plaintiff,)
v.)
CANADA,)
Defendant.)
) Civil Action No. 1:17-cv-10519-NMG
) MOTION FOR ADMISSION *PRO HAC
VICE* OF ATTORNEY SIMON A. STEEL

Defendant Canada, pursuant to Local Rule 83.5.3, hereby moves for the *pro hac vice* admission of Simon A. Steel, an attorney at Dentons US LLP, with offices at 1900 K Street NW, Washington DC 20006. Such admission is for the purpose of this case only.

As grounds for this motion, and as set forth in the attached Affidavit of Simon A. Steel,
Defendant Canada states as follows:

1. Mr. Steel is duly admitted and licensed to practice law in the state of New York; in the Supreme Court of the United States, and in the U.S. Courts of Appeals for the First, Seventh, Ninth, Tenth and D.C. Circuits. Mr. Steel is also a non-practicing member of the Bar of England and Wales.

2. There are no disciplinary proceedings pending against Mr. Steel as a member of the bar in any jurisdiction.

3. Mr. Steel is familiar with the Local Rules for the United States District Court for the District of Massachusetts.

4. Defendant Canada have requested that Mr. Steel represent it in this action before this Court. Mr. Steel has already represented Canada in this proceeding in appellate proceedings before the First Circuit and the Supreme Court.

5. Plaintiff Cynthia L. Merlini assents to this motion.

WHEREFORE, Defendant Canada respectfully requests that this Court grant this motion and permit Simon A. Steel to enter his appearance *pro hac vice* in the above-captioned matter.

Dated: June 12, 2020

Respectfully submitted,

DEFENDANT CANADA,

By its Attorneys,

/s/ Tony K. Lu

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CERTIFICATION OF SIMON A. STEEL

Pursuant to this Court's Rule 83.5.3(e)(3), I, Simon Arthur Steel, hereby certify as follows:

1. I am not a member of the bar of this Court or of the Massachusetts bar. I am seeking admission *pro hac vice* to this Court to represent Defendant Canada in *Merlini v. Canada*, No. 1:17-cv-10519-NMG. I have previously represented Canada in this proceeding on appeal before the U.S. Court of Appeals for the First Circuit and the U.S. Supreme Court.
2. I am a member in active good standing of the bars of the following courts:
 - a) the New York Court of Appeals (No. 2655223);
 - b) the Supreme Court of the United States;
 - c) the U.S. Court of Appeals for the First Circuit;
 - d) the U.S. Court of Appeals for the Seventh Circuit;
 - e) the U.S. Court of Appeals for the Ninth Circuit;
 - f) the U.S. Court of Appeals for the Tenth Circuit;
 - g) the U.S. Court of Appeals for the D.C. Circuit.
3. I am also an inactive member of the Bar of England and Wales.
4. I am not currently, and have never been, subject to disciplinary proceedings in any jurisdiction in which I have been admitted to practice.
5. I have not previously been admitted to this Court (*pro hac vice* or otherwise), and have never had my admission to any court revoked for misconduct.
6. I have read and agree to comply with this Court's Local Rules.

/s/ Simon A. Steel
Simon A. Steel¹
Dentons US LLP
1900 K Street NW
Washington DC 20006
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(202) 496-7077

Dated: June 12, 2020

¹ Not admitted in DC. Authorized to practice in federal courts under D.C. Court of Appeals Rule 49(c)(3).

CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)

I hereby certify that Defendant has conferred with Plaintiff and Plaintiff assents to this motion.

/s/ *Tony K. Lu*
Tony K. Lu

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all parties as identified on the NEF on June 12, 2020.

/s/ *Tony K. Lu*
Tony K. Lu